

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
:
Wanda D Wilson : No. 18-16752-JKF
Debtor :

MOTION TO SELL REAL ESTATE FREE AND CLEAR OF LIENS & ENCUMBRANCES

Real Estate To Be Sold: 1036 N Pallas Street, Philadelphia, PA
19104

The above named Debtor, respectfully moves this Court as follows:

1. On October 10, 2018, the above Debtor filed the instant Chapter 13 Petition, and jurisdiction is based on 28 U.S.C. Sections 1334 and 157.

2. This motion requests permission to sell the said real estate located at 1036 N Pallas Street, Philadelphia, PA 19104

3. There is no mortgage on the property.

4. The Debtor, according to the terms and conditions contained in the attached Agreement of Sale, dated November 24, 2019, to Greg Greg Yuter which provides for the sale price of Twenty-Two Thousand and Five Hundred Dollars (\$22,500.00). See Exhibit "A".

5. The Debtor believes the above referenced price to be the best obtainable price in today's market based on the condition of the property.

6. It is believe the Trustee will receive the excess of funds after the sale costs and the Debtor's exemptions have been considered.

TREATMENT OF LIEN CREDITORS

7. Debtor seeks an Order from this Court approving the sale of said real estate with the liens of any creditor attaching to the proceeds of the sale.

8. This is a Chapter 13 Adjustment of debts and reorganization of the Debtor's financial affairs, and said sale is in the best interests of the Debtor, the estate and the creditors.

WHEREFORE, the Debtor respectfully requests this Honorable Court to issue an Order approving the sale of the real estate, and with any encumbrances being paid in full at settlement and for such further relief as this Court deems just and proper.

/s/ David M. Offen
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Dated: 2/10/20